

OFFICE OF THE GENERAL COUNSEL
Division of Operations-Management

MEMORANDUM OM

TO : All Regional Directors, Officers-in-Charge,
and Resident Officers

FROM : B. Allan Benson, Acting Associate General Counsel

SUBJECT: Recent GC/OM Memoranda Relating to Compliance

At the September 1995 field supervisory conference, we included in the binder distributed to all participants a group of recent GC and OM Memoranda relating to compliance matters. A list of these memoranda is attached.

We believe that these memoranda constitute an excellent desk reference for each Compliance Supervisor/Officer. Thus, it is requested that you arrange, unless this has already occurred, for a copy of this material to be made and given to your Compliance Supervisor/Officer. We have also placed on the Compliance Bulletin Board a copy of the text of each OM or GC Memorandum (but not any attachments). We plan to place future OM or GC Memoranda relating to compliance matters on the Compliance Bulletin Board.

Please review the applicable memoranda to ensure that your Region is observing the requirements therein as well as taking advantage of identified resources (e.g., see OM 95-39, Sources for Establishing Alter Egos, Disguised Continuances and Successors). In this regard, Regions are again reminded to make use of the Federal Debt Collection Procedures Act (see OM 94-59, OM 94-93 and OM 96-19, which issued February 28, 1996), as well as the recidivist identification information referred to in OM 95-55. Regions needing assistance in these or other compliance matters should contact their Assistant General Counsel or the Contempt Litigation Branch.¹

¹ The 1994 decision of the United States District Court for the District of Massachusetts in *NLRB v. Sisselman*, involving the Board's first use of the fraudulent conveyance provisions of the FDCPA (as referenced in Memorandum OM 94-93), was subsequently published at 147 LRRM 2594.

Appreciation is extended to the Contempt Litigation Branch for their efforts in compiling the list of relevant memoranda.

B. A. B.

Attachment

Distribution: All Compliance Supervisors
and Compliance Officers

cc: NLRBU

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